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United States Environmental Protection Agency
Washington, D.C. 20460
Office of Solid Waste and Emergency Response

March 31, 1994

MEMORANDUM

Subject: Response to Request For Interpretation on
Regulatory Status of Mercury Relays and
Switches When Reclaimed

From: Michael Petruska, Chief Regulatory Development
Branch (5304), Office of Solid Waste

To: Karen Schwinn, Chief Waste Compliance Branch (H-4) Region IX

In response to your October 29, 1993 request for guidance on the regulation of mercury wetted relays and switches that are recycled, the Office of Solid Waste has recently completed a memorandum (see attached March 24, 1994 memorandum from Michael Shapiro to Regional Division Directors) clarifying the definition of spent material.

The March 24 memorandum clarifies that used mercury switches sent for reclamation are classified as spent materials (see page 4 of the March 24 memorandum). Therefore, these materials are solid wastes and also hazardous wastes.

I hope that this responds to your request for guidance. If you have any additional questions, please contact Paul Borst of my staff at (202) 260-6713.

Attachment